

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED JAN 23 2015 CLERK, U.S. DISTRICT COURT By _____ Deputy	1024 am
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Lisa A. Biron,
Petitioner

v.

Jody Upton, Warden,
Respondent.

Case No.: 4:14-CV-772-0
(Consolidated with
4:14-CV-823-0)

PETITIONER'S MOTION TO ENLARGE REPLY DEADLINE

Petitioner, Lisa A. Biron, moves this honorable Court to extend her January 26, 2015 deadline to file her Reply by fourteen (14) days, and states in support as follows:

The prison's "law library" that is combined with the leisure library, where all typing and legal research must take place, has been closed excessively over the past two weeks. For example, it was closed last Friday, the 16th so prison staff could attend a culinary program banquet. It is closed on all holidays, as it was yesterday the 19th, and Petitioner just learned it will be closed AGAIN all this Thursday (the 22nd) afternoon for a prison staff meeting.

When it is open, the hours are extremely limited. With these limitations and without word processing capabilities, more time is needed to finish Petitioner's Reply.

Petitioner left a message on AUSA Angie Henson's voicemail, but was not able to reach her for her assent (before having to get this motion in the mail — legal mail may only be mailed out between 7:00-7:30 a.m.)

Respectfully submitted by

January 21, 2015
Date

Lisa Biron
Lisa Biron
Reg. Id.# 12775-049
FMC Carswell
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CERTIFICATION

I hereby certify that on this date a copy of this document was mailed First Class U.S. Mail, postage paid, to Angie Henson, Esq. by depositing said document in the inmate legal mail system.

January 21, 2015
Date

Lisa Biron
Lisa Biron